

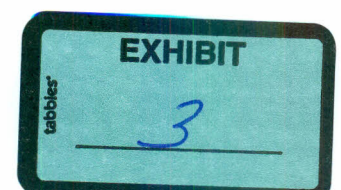
UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

PETER KEPPARD, JR., TRINIDAD	§	CAUSE NO.: 5:15-cv-00625-OLG
AVILA, ALONSO ROBLES, GUILLERMO	§	
TREVINO, HUMBERTO CASTILLO,	§	
HECTOR A VALLEJO, and HECTOR	§	
VALLEJO, On Behalf of Themselves and	§	
All Others Similarly Situated,	§	
	§	
PLAINTIFFS	§	
	§	
v.	§	
	§	
C. C. FORBES, LLC,	§	JURY TRIAL DEMANDED
FORBES ENERGY SERVICES, LTD, and	§	
FORBES ENERGY SERVICES, LLC	§	
	§	
DEFENDANTS	§	

DECLARATION OF KATHERINE CLIFTON

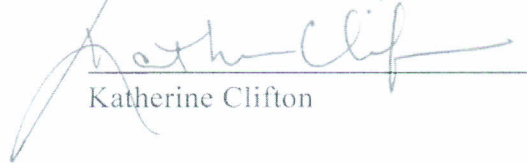
I, Katherine Clifton, declare the following to be true and correct:

1. My name is Katherine Clifton. I am over the age of eighteen years, have never been convicted of a felony or crime of moral turpitude and am otherwise competent to make this affidavit. I am authorized to make this affidavit and have personal knowledge of the facts contained herein and those facts are true and correct.
2. I am employed by Forbes Energy Services, LLC. I am the Human Resources/Payroll Manager. I am familiar with the corporate structure and business of Forbes Energy Services, LLC and Forbes Energy Services, LTD and C. C. Forbes, LLC.
3. Forbes Energy Services, Ltd is a holding company and has no employees. It owns Forbes Energy Services, LLC. Forbes Energy Services, LLC is the parent company of C.C. Forbes, LLC.
4. Forbes Energy Services, LLC has executive, management, administrative and other office employees only. Forbes Energy Services, LLC does not employ drivers, mechanics, or persons who work on rigs.
5. Forbes Energy Services, LLC is not the employer of Plaintiffs in the above referenced case.



6. I was involved in an investigation conducted by the Department of Labor relating to employees of C.C. Forbes, LLC. As a result of that investigation, C.C. Forbes has settled overtime wage claims of many of its employees that worked in the Coil Tubing Division. The settlement was approved by the Department of Labor based on the Department of Labor's calculations of unpaid overtime relating to bonus amounts not being included in the regular rate of pay.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 12th day of November 2015.


Katherine Clifton